

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

|  |                                  |
|--|----------------------------------|
| DEBORAH CHIN, Individually and On Behalf)  | Civil Action No. 04-CV-10294-DPW |
| of All Others Similarly Situated,          | )                                |
|  | )                                |
| Plaintiff,                                 | )                                |
|  | )                                |
| vs.  | )                                |
|  | )                                |
| SONUS NETWORKS, INC., et al.,              | )                                |
|  | )                                |
| Defendants.                                | )                                |
|  | )                                |
| _____                                      | )                                |
| MICHELLE TREBITSCH, On Behalf of           | Civil Action No. 04-CV-10307-DPW |
| Herself and All Others Similarly Situated, | )                                |
|  | )                                |
| Plaintiff,                                 | )                                |
|  | )                                |
| vs.  | )                                |
|  | )                                |
| SONUS NETWORKS, INC., et al.,              | )                                |
|  | )                                |
| Defendants.                                | )                                |
|  | )                                |
| _____                                      | )                                |

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AFFIDAVIT OF JOHN E. DEWICK IN SUPPORT OF REPLY MEMORANDUM IN  
SUPPORT OF THE GLOBAL UNDERVALUED SECURITIES MASTER FUND'S MOTION  
TO BE APPOINTED LEAD PLAINTIFF PURSUANT TO §21D(A)(3)(B) OF THE  
SECURITIES EXCHANGE ACT OF 1934 AND FOR APPOINTMENT OF LEAD COUNSEL

|   |   |                                  |
|---|---|----------------------------------|
| INFORMATION DYNAMICS, LLC, On             | ) | Civil Action No. 04-CV-10308-DPW |
| Behalf of Itself and All Others Similarly | ) |                                  |
| Situated,                                 | ) | <u>CLASS ACTION</u>              |
|   | ) |                                  |
| Plaintiff,                                | ) |                                  |
|   | ) |                                  |
| vs.                                       | ) |                                  |
|   | ) |                                  |
| SONUS NETWORKS, INC., et al.,             | ) |                                  |
|   | ) |                                  |
| Defendants.                               | ) |                                  |
|   | ) |                                  |
| <hr/>                                     | ) |                                  |
| PETER KALTMAN, On Behalf of Himself       | ) | Civil Action No. 04-CV-10309-DPW |
| and All Others Similarly Situated,        | ) |                                  |
|   | ) | <u>CLASS ACTION</u>              |
| Plaintiff,                                | ) |                                  |
|   | ) |                                  |
| vs.                                       | ) |                                  |
|   | ) |                                  |
| SONUS NETWORKS, INC., et al.,             | ) |                                  |
|   | ) |                                  |
| Defendants.                               | ) |                                  |
|   | ) |                                  |
| <hr/>                                     | ) |                                  |
| SAMANTHA DEN, Individually and On         | ) | Civil Action No. 04-CV-10310-DPW |
| Behalf of All Others Similarly Situated,  | ) |                                  |
|   | ) | <u>CLASS ACTION</u>              |
| Plaintiff,                                | ) |                                  |
|   | ) |                                  |
| vs.                                       | ) |                                  |
|   | ) |                                  |
| SONUS NETWORKS, INC., et al.,             | ) |                                  |
|   | ) |                                  |
| Defendants.                               | ) |                                  |
|   | ) |                                  |
| <hr/>                                     | ) |                                  |

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|  |   |                                  |
|--|---|----------------------------------|
| RICHARD CURTIS, Individually and On          | ) | Civil Action No. 04-CV-10314-MLW |
| Behalf of All Others Similarly Situated,     | ) |                                  |
|  | ) | <u>CLASS ACTION</u>              |
| Plaintiff,                                   | ) |                                  |
|  | ) |                                  |
| vs.  | ) |                                  |
|  | ) |                                  |
| SONUS NETWORKS, INC., et al.,                | ) |                                  |
|  | ) |                                  |
| Defendants.                                  | ) |                                  |
|  | ) |                                  |
| <hr/>  | ) |                                  |
| RONALD KASSOVER, On Behalf of the            | ) | Civil Action No. 04-CV-10329-DPW |
| Ronald Kassover IRA and All Others Similarly | ) |                                  |
| Situated,                                    | ) | <u>CLASS ACTION</u>              |
|  | ) |                                  |
| Plaintiff,                                   | ) |                                  |
|  | ) |                                  |
| vs.  | ) |                                  |
|  | ) |                                  |
| SONUS NETWORKS, INC., et al.,                | ) |                                  |
|  | ) |                                  |
| Defendants.                                  | ) |                                  |
|  | ) |                                  |
| <hr/>  | ) |                                  |
| STEVE L. BAKER, Individually and On          | ) | Civil Action No. 04-CV-10333-DPW |
| Behalf of All Others Similarly Situated,     | ) |                                  |
|  | ) | <u>CLASS ACTION</u>              |
| Plaintiff,                                   | ) |                                  |
|  | ) |                                  |
| vs.  | ) |                                  |
|  | ) |                                  |
| SONUS NETWORKS, INC., et al.,                | ) |                                  |
|  | ) |                                  |
| Defendants.                                  | ) |                                  |
|  | ) |                                  |
| <hr/>  | ) |                                  |

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|   |   |                                  |
|---|---|----------------------------------|
| MICHAEL KAFFEE, Individually and On<br>Behalf of All Others Similarly Situated,         | ) | Civil Action No. 04-CV-10345-DPW |
|   | ) |                                  |
| Plaintiff,  | ) | <u>CLASS ACTION</u>              |
|   | ) |                                  |
| vs.   | ) |                                  |
|   | ) |                                  |
| SONUS NETWORKS, INC., et al.,   | ) |                                  |
|   | ) |                                  |
| Defendants.   | ) |                                  |
|   | ) |                                  |
| <hr/> HAIMING HU, Individually and On Behalf of<br>All Others Similarly Situated,       | ) | Civil Action No. 04-CV-10346-DPW |
|   | ) |                                  |
| Plaintiff,  | ) | <u>CLASS ACTION</u>              |
|   | ) |                                  |
| vs.   | ) |                                  |
|   | ) |                                  |
| SONUS NETWORKS, INC., et al.,   | ) |                                  |
|   | ) |                                  |
| Defendants.   | ) |                                  |
|   | ) |                                  |
| <hr/> CHARLES STARBUCK, Individually and On<br>Behalf of All Others Similarly Situated, | ) | Civil Action No. 04-CV-10362-DPW |
|   | ) |                                  |
| Plaintiff,  | ) | <u>CLASS ACTION</u>              |
|   | ) |                                  |
| vs.   | ) |                                  |
|   | ) |                                  |
| SONUS NETWORKS, INC., et al.,   | ) |                                  |
|   | ) |                                  |
| Defendants.   | ) |                                  |
|   | ) |                                  |
| <hr/>   | ) |                                  |

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|   |   |                                  |
|---|---|----------------------------------|
| SAMUEL HO, Individually and On Behalf of    | ) | Civil Action No. 04-CV-10363-DPW |
| All Others Similarly Situated,              | ) |                                  |
|   | ) | <u>CLASS ACTION</u>              |
| Plaintiff,                                  | ) |                                  |
| vs.   | ) |                                  |
| SONUS NETWORKS, INC., et al.,               | ) |                                  |
|   | ) |                                  |
| Defendants.                                 | ) |                                  |
| <hr/>                                       |   |                                  |
| JEFFREY C. RODRIGUES, Individually and      | ) | Civil Action No. 04-CV-10364-DPW |
| On Behalf of All Others Similarly Situated, | ) |                                  |
|   | ) | <u>CLASS ACTION</u>              |
| Plaintiff,                                  | ) |                                  |
| vs.   | ) |                                  |
| SONUS NETWORKS, INC., et al.,               | ) |                                  |
|   | ) |                                  |
| Defendants.                                 | ) |                                  |
| <hr/>                                       |   |                                  |
| ROBERT CONTE and MARK RESPLER,              | ) | Civil Action No. 04-CV-10382-DPW |
| Themselves and On Behalf of All Others      | ) |                                  |
| Similarly Situated,                         | ) | <u>CLASS ACTION</u>              |
|   | ) |                                  |
| Plaintiffs,                                 | ) |                                  |
| vs.   | ) |                                  |
| SONUS NETWORKS, INC., et al.,               | ) |                                  |
|   | ) |                                  |
| Defendants.                                 | ) |                                  |
| <hr/>                                       |   |                                  |

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|   |   |                                  |
|---|---|----------------------------------|
| WHEATON ELECTRICAL SERVICES                   | ) | Civil Action No. 04-CV-10383-DPW |
| RETIREMENT 401K PROFIT SHARING                | ) |                                  |
| PLAN, On Behalf of Itself and All Others      | ) | <u>CLASS ACTION</u>              |
| Similarly Situated,                           | ) |                                  |
|   | ) |                                  |
| Plaintiff,                                    | ) |                                  |
|   | ) |                                  |
| vs.   | ) |                                  |
|   | ) |                                  |
| SONUS NETWORKS, INC., et al.,                 | ) |                                  |
|   | ) |                                  |
| Defendants.                                   | ) |                                  |
|   | ) |                                  |
| <hr/> BRIAN CLARK, Individually and On Behalf | ) | Civil Action No. 04-CV-10454-DPW |
| of All Others Similarly Situated,             | ) |                                  |
|   | ) | <u>CLASS ACTION</u>              |
| Plaintiff,                                    | ) |                                  |
|   | ) |                                  |
| vs.   | ) |                                  |
|   | ) |                                  |
| SONUS NETWORKS, INC., et al.,                 | ) |                                  |
|   | ) |                                  |
| Defendants.                                   | ) |                                  |
|   | ) |                                  |
| <hr/> SHEILA BROWNELL, Individually and On    | ) | Civil Action No. 04-CV-10597-DPW |
| Behalf of All Others Similarly Situated,      | ) |                                  |
|   | ) | <u>CLASS ACTION</u>              |
| Plaintiff,                                    | ) |                                  |
|   | ) |                                  |
| vs.   | ) |                                  |
|   | ) |                                  |
| SONUS NETWORKS, INC., et al.,                 | ) |                                  |
|   | ) |                                  |
| Defendants.                                   | ) |                                  |
|   | ) |                                  |
| <hr/>   | ) |                                  |

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SAVERIO PUGLIESE, On Behalf of Himself ) Civil Action No. 04-CV-10612-DPW  
and All Others Similarly Situated, )

Plaintiff, ) CLASS ACTION

vs. )

SONUS NETWORKS, INC., et al., )  
Defendants. )

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DAVID V. NOCITO, On Behalf of Himself ) Civil Action No. 04-CV-10623-DPW  
and All Others Similarly Situated, )

Plaintiff, ) CLASS ACTION

vs. )

SONUS NETWORKS, INC., et al., )  
Defendants. )

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JONATHAN A. ZULAUF, On Behalf of ) Civil Action No. 04-CV-10714-DPW  
Himself and All Others Similarly Situated, )

Plaintiff, ) CLASS ACTION

vs. )

SONUS NETWORKS, INC., et al., )  
Defendants. )

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I, John E. DeWick, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of Massachusetts and this court. I am a member of the law firm of Melick, Porter & Shea, LLP, proposed liaison counsel of record for plaintiff in the above-entitled action. I make this Affidavit in support of the Reply Memorandum in Support of the Global Undervalued Securities Master Fund's Motion to be Appointed Lead Plaintiff Pursuant to §21D(a)(3)(B) of the Securities Exchange Act of 1934 and for Appointment of Lead Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

- Exhibit A: Notice of Withdrawal of Motion by Saverio Pugliese for Consolidation, Appointment as Lead Plaintiff, and for Approval of Choice of Lead Counsel, filed April 22, 2004;
- Exhibit B: Notice of Withdrawal of Motion by the Jiang Group for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel and Liaison Counsel, filed April 26, 2004;
- Exhibit C: Belland Group's Notice of Withdrawal of Its Motion to Be Appointed Lead Plaintiff and for Approval of Its Choice as Lead Counsel, filed April 26, 2004;
- Exhibit D: Notice of Withdrawal of Motion by Chris E. Paterick for Consolidation, Appointment of Lead Plaintiff and for Approval of Selection of Class Counsel, filed April 30, 2004;
- Exhibit E: *Pierce v. Americredit Corp., et al.*, No. 4:03-CV-026-Y, Order (N.D. Tex. May 19, 2003);
- Exhibit F: Trading Summary Trade Confirmation of Global Undervalued Securities Master Fund;
- Exhibit G: Firm resume of Lerach Coughlin Stoia & Robbins LLP;
- Exhibit H: Bloomberg News, *Milberg Weiss Becomes 2 Firms*, N.Y. Times, May 4, 2004;



Exhibit I: Milberg Weiss Completes Planned Separation; Joint Statement by Milberg Weiss Bershad & Schulman LLP and Lerach Coughlin Stoia & Robbins LLP, published on *PR Newswire* on May 3, 2004; and

Exhibit J: *Alfaro v. CapRock Comm. Corp.*, No. 3:00-CV-1613-R, Order (N.D. Tex. Dec. 11, 2000).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this \_\_\_\_\_ day of May, 2004, at Boston, Massachusetts.

\_\_\_\_\_  
/s/ John E. DeWick  
JOHN E. DEWICK

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each party by mail on 5/10/04.

\_\_\_\_\_  
/s/ John E. DeWick

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DECLARATION OF SERVICE BY MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interest in the within action; that declarant's business address is 401 B Street, Suite 1700, San Diego, California 92101.

2. That on May 10, 2004, declarant served the AFFIDAVIT OF JOHN E. DEWICK IN SUPPORT OF REPLY MEMORANDUM IN SUPPORT OF THE GLOBAL UNDERVALUED SECURITIES MASTER FUND'S MOTION TO BE APPOINTED LEAD PLAINTIFF PURSUANT TO §21D(A)(3)(B) OF THE SECURITIES EXCHANGE ACT OF 1934 AND FOR APPOINTMENT OF LEAD COUNSEL by depositing a true copy thereof in a United States mailbox at San Diego, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of May, 2004, at San Diego, California.

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SHARON E. FORD